

CERTIFICATION

I, Michael J. Umamo, hereby certify as a company officer that I have personal knowledge that this company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2011.



Name: Michael J. Umamo

Title: Executive Vice President

Date: 02/15/2008

FRN# 0004036042

STATEMENT

Industrial Communications & Electronics, Inc. (ICE) has established operating procedures that ensure compliance with the Federal Communication Commission (“Commission”) regulations regarding the protection of customer proprietary network information (“CPNI”).

- ICE has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
- ICE continually educates and trains its employees regarding the appropriate use of CPNI. ICE has established disciplinary procedures should an employee violate the CPNI procedures established by ICE.
- ICE maintains a record of its and its affiliates’ sales and marketing campaigns that use its customers’ CPNI. ICE also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- ICE has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, ICE’s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- ICE took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by ICE at a state commission, in the court system, or at the Federal Communications Commission: None.
- The following is information ICE has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: ICE has determined that no pretexter has attempted to access CPNI on ICE’s system.

- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:

- Number of customer complaints ICE received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None.

- Category of complaint:

- _____ Number of instances of improper access by employees

- _____ Number of instances of improper disclosure to individuals not authorized to receive the information

- _____ Number of instances of improper access to online information by individuals not authorized to view the information

- _____ Number of other instances of improper access or disclosure

- Description of instances of improper access or disclosure: